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April 23, 2018

**Via ECF**

Hon. Gregory H. Woods, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Rivera v. The Anthem Companies, Inc., et al.*  
Case No. 18-cv-01420

Dear Judge Woods:

We are counsel to Plaintiff. We respectfully submit this letter in response to Defendants' April 19, 2018 letter, in which Defendants announced their intent to file a motion to dismiss. *See* Dkt. No. 18.

Although Plaintiff disputes and opposes the arguments made in Defendants' April 19, 2018 letter, in the interests of judicial economy and to avoid unnecessary motion practice, Plaintiff intends to file an amended Complaint, pursuant to Your Honor's Individual Practices § 3(D). Plaintiff proposes to file his amended Complaint by May 18, 2018.

In view of the foregoing, Plaintiff respectfully requests that the pre-motion teleconference, scheduled for April 27, 2018 at 3:00 p.m. be adjourned *sine die*.

Respectfully submitted,

/s/ Anne Seelig  
Anne Seelig, Esq.

cc: Defendants via ECF